

*Application Serial No. 09/835,311*  
*Amendment Dated April 4, 2005*  
*Reply to Office Action mailed October 6, 2004*

### **REMARKS/ARGUMENTS**

Claims 1-14 are pending in the Application. As set forth more fully below, reconsideration and withdrawal of the Examiner's rejections of the claims are respectfully requested.

#### **Objection to the Specification**

The Examiner has objected to the Abstract as not being a brief narrative of the disclosure in a single paragraph of less than 150 words. Applicants have inserted an Abstract with this Amendment to conform with these requirements of the Abstract of the disclosure in a format that is believed to address the Examiner's objection.

#### **Rejections Under 35 U.S.C. § 112, Second Paragraph**

The Examiner has rejected Claim 1 under 35 U.S.C. § 112, second paragraph, as failing to set forth the subject matter which Applicants regard as their invention. Specifically, the Examiner notes that there is no antecedent basis for the term "digital media" in line 10 of Claim 1. Applicants have amended Claim 1 to provide antecedent basis for the term.

The Examiner has rejected Claim 3 under 35 U.S.C. § 112, second paragraph, as failing to set forth the subject matter which Applicants regard as their invention. Specifically, the Examiner notes that there is no antecedent basis for the term "each digital medium" in line 1 of Claim 3. Applicants have amended Claim 3 to recite "digital media" which finds proper antecedent basis in Claim 1, as amended.

In light of these amendments, Applicants submit that the pending claims set forth the subject matter regarded as the invention with sufficient clarity to satisfy the requirements of the second paragraph of 35 U.S.C. § 112.

Claim Rejections Under 35 U.S.C. § 102

The Examiner has rejected Claims 1-3 and 13-14 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,766,163 (hereinafter "Sharma"). The Examiner notes that Sharma discloses an interface with television stations designed to acquire news coming from the television station and save this information in an internal format different from the original input format of this news; a central core for recording and decoding the teletext messages from the television station; a controller for use by operators processing digital contents stored in the central core to record the message in memory; and an interface with digital media that converts the saved news to a format for broadcast to mobile stations.

Applicants submit that Sharma does not disclose each of the limitations of the instant claims. Specifically, Sharma teaches the use of a teletext decoder that decodes teletext from a television station and passes the information to a controller that may save the decoded teletext to a memory unit or transmit the teletext to a cellular network via a network interface (see Figure 3 and the Summary of the Invention, particularly at column 2, lines 35-67). Thus, Sharma does not teach the following limitations of Claim 1:

"an interface with heterogeneous digital content sources"

The platform of Sharma decodes teletext information encoded in the vertical blanking interval of a television signal (see column 2, lines 35-39). Thus, although the platform of Sharma may receive the teletext information from different sources (i.e. different television networks), the teletext information is encoded in the same format and therefore is not from heterogeneous digital content sources.

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“designed to acquire heterogeneous digital contents in various formats to describe them in a uniform way”

Because the platform of Sharma receives only homogenous digital content (teletext information encoded within a television signal), the decoder is designed only to decode teletext information for storage as a teletext message. Thus, the Sharma interface does not acquire heterogeneous digital contents in various formats but instead acquires only homogenous digital contents of a single format.

“an interface with digital media designed to carry out a conversion of the internal format of the value added digital contents into a format designed for publishing of said value added digital contents on respective digital media”

Because the platform of Sharma is designed to receive and decode only teletext information from television stations, the decoded format of these teletext messages is broadcast, or (optionally) stored before being broadcast, in a single format to the mobile station. Thus, there is no need or use for an interface to convert the decoded teletext messages into another format prior to broadcast to the mobile stations in the Sharma system. Indeed, the network interface (308) of Sharma is only responsible for communicating with mobile stations through a cellular network (see column 6, lines 6-8). No conversion of the internal format of the teletext messages of Sharma is conducted before transmission to the mobile stations because the mobile stations of Sharma all receive the information in the same format - eliminating the need for a digital media interface for conversion of the internal format that is required by the platform of the present invention.

Therefore, because Claims 1-3 and 13-14 all require the presence of:

- 1) an interface with heterogeneous digital content sources, designed to acquire heterogeneous digital contents in various formats, coming from said heterogeneous sources to describe them in a uniform way in an internal format, which is independent of the input format; and,
- 2) an interface with digital media designed to carry out a conversion of the internal format of the value added digital contents into a format designed for publishing of said value added digital contents on respective digital media;

and because the Sharma reference does not disclose or suggest either of these limitations, the Sharma reference does not anticipate Claims 1-3 and 13-14. Therefore the rejection of these claims over the Sharma reference under 35 U.S.C. § 102(e) should be withdrawn.

Claim Rejections Under 35 U.S.C. § 103

The Examiner has rejected Claims 4-7 and 10-11 under 35 U.S.C. § 103(a) as being obvious over Sharma in view of U.S. Patent Application Publication No. 2002/0080170 (hereinafter "Goldberg").

As noted above, Sharma does not teach an interface with digital media designed to carry out a conversion of the internal format of the teletext messages into a format designed for publishing on various heterogeneous digital media. Goldberg does not overcome this deficiency of the Sharma disclosure.

Instead, Goldberg teaches multiple interfaces (see Figure 23, references numerals 2330-2360) each designed to interact bidirectionally with the network (or users) and the portfolio

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controller (2310). For each one of these separate interfaces (2330-2360) of Goldberg, a single conversion of format is made. For example, Graphical Web interface 2330 of Goldberg transfers data supplied by the network (or users) to the portfolio controller (2310) for saving in the portfolio database (2320).

Thus, the system of Goldberg addresses the use of multiple formats using an inventive method that is different from the platform of the present invention. Goldberg discloses a different solution to a similar problem. Goldberg uses many individual interfaces for communicating between the heterogeneous digital media (network or users) and the system controller (2310). The instant application discloses and claims a single interface that operates to convert the data stored in a single standard format into heterogeneous formats corresponding to various heterogeneous digital media.

Therefore, even if the multiple interfaces (2330-2360) of Goldberg were to be incorporated into the system of Sharma, the combined system still would not teach an interface with digital media designed to carry out a conversion of the internal format of value added digital contents into a format designed for publishing on respective digital media required by each of Claims 4-7 and 10-11. Accordingly, the combination of Sharma and Goldberg does not teach or suggest every limitation of Claims 4-7 and 10-11 and the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn.

The Examiner has rejected Claims 8 and 9 under 35 U.S.C. § 103(a) as being obvious over Sharma in view of Goldberg and further in view of U.S. Patent Application Publication No. 2003/0007625 (hereinafter "Pines").

As noted above, the combination of Sharma and Goldberg does not teach all of the limitations of the pending claims. Specifically, this combination fails to teach or suggest any system that includes an interface with digital media designed to carry out a conversion of an internal format of digital contents into a format designed for publishing on various heterogeneous digital media. Pines does not overcome this deficiency in the combination of Sharma and Goldberg. Pines teaches a communication assistance system that can store and transmit various forms of subscriber information. In collecting and storing the information, several databases (14, 18, 18', 30, 34, 38, 40, 75) are used and different devices access and send the information stored on these databases. All of the information is ultimately sent to a communication apparatus user. Thus, the system has many databases containing data in various forms that are accessed and sent to a single type of receiver. This is in direct contrast to the presently claimed platform in which data is saved and stored in a single, generic format and then accessed and translated by one interface for sending to many different digital media systems. There is no need for any such single interface to translate the various data formats used in Pines and thus, there is no teaching or suggestion of any such interface in Pines. As neither Sharma, Goldberg or Pines teach or suggest an interface designed to carry out a conversion of the internal format of value added digital contents into a format designed for publishing on respective digital media required by each of the presently pending claims, the combination does not teach each of the limitations of Claims 8 and 9 and the rejection of these claims under 35 U.S.C. § 103(a) should be withdrawn.

The Examiner has rejected Claim 12 under 35 U.S.C. § 103(a) as being obvious over Sharma in view of Pines. As explained above, neither Sharma nor Pines teach or suggest an interface designed to carry out a conversion of the internal format of value added digital contents

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into a format designed for publishing on respective digital media required by Claim 12.

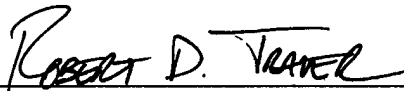
Therefore, the combination of Sharma and Pines does not teach each of the limitations of Claim 12 and the rejection of this claim under 35 U.S.C. § 103(a) should be withdrawn.

Based upon the foregoing, Applicants believe that all pending claims are in condition for allowance and such disposition is respectfully requested. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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